

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

Joseph bradley Garrison )  
(full name) (Register No.) )

Plaintiff(s).

v.

Vernon County Jail )  
(Full name) )  
Vernon Co. Mo. )

Defendant(s).

**18-5051 - CV - SW - SRB - P**

Case No. \_\_\_\_\_

Defendants are sued in their (check one):

☐ Individual Capacity

☐ Official Capacity

☒ Both

**COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983**

I. Place of present confinement of plaintiff(s): Lawrence Co Jail, Mt. Vernon  
MO. 65712

II. Parties to this civil action:

Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff Joseph bradley Garrison Register No. \_\_\_\_\_  
Address 1716 East 8th st, Springfield, MO 65802  
IN care of: Sarah Jones

B. Defendant Vernon County Jail  
any and all persons and law enforcement Responsible  
Is employed as \_\_\_\_\_

For additional plaintiffs or defendants, provide above information in same format on a separate page.

III. Do your claims involve medical treatment?

Yes ☒ No ☐

IV. Do you request a jury trial?

Yes ☐ No ☒

V. Do you request money damages?

Yes ☒ No ☐

State the amount claimed?

\$15,000 / 10,000 (actual/punitive)

VI. Are the wrongs alleged in your complaint continuing to occur? Yes ☒ No ☐

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure?

Yes ☒ No ☐

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution?

Yes ☒ No ☐

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

E-Filed on kiosk in Vernon County Jail  
Tues May 15 2018 First grievance and every day  
I Filed a grievance For 9 days while there  
Never received results or answers written or verbal.

D. If you have not filed a grievance, state the reasons.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VIII. Previous civil actions:

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case?

Yes ☐ No ☒

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated?

Yes ☐ No ☒

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: \_\_\_\_\_  
(Plaintiff) (Defendant)

(2) Date filed: \_\_\_\_\_

- (3) Court where filed: \_\_\_\_\_
- (4) Case Number and citation: \_\_\_\_\_
- (5) Basic claim made: \_\_\_\_\_
- (6) Date of disposition: \_\_\_\_\_
- (7) Disposition: \_\_\_\_\_  
(Pending) (on appeal) (resolved)
- (8) If resolved, state whether for: \_\_\_\_\_  
(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

- A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

See attachment (w/pendages)

Facts of claim to be facts and true to the best of my recollection

I am mentally disabled and this has been extremely difficult for me and is only getting worse due to Negligence of Vernon County. I am mentally disabled since July 2011

- B. State briefly your legal theory or cite appropriate authority:

Medical Negligence while in jail in Vernon County. I feel there is no way possible that my Humiliation and degradation and abuse could still leave my fingers blue to not having my meds. Because I have mental health issues and have received one of my meds for 5 years and have to have someone else write this down for me because it bothers me so much and I am upset about repercussions from the County of Vernon, Mo For this But I don't want others to have to go through this Torment and pain and suffering.

# Last Sunday since incarceration May 02-18

Joseph Bradley Garrison

1-24-78 / SS# 491800448  
Federal ID# 14976045 / Prison State ID# 523604

1716 E. 8<sup>th</sup> St Springfield, MO 65802  
417-430-6547

Wed May 02-2018

Green Co. Jail - Cox North Springfield MO  
From there on Day 2 was Arrested, For my  
Infected and Broken Index Finger on my Left  
Hand. Taken By Transport officer for Green County  
MO. (Springfield) to the Emergency Room  
(See medical Report From North Cox Hospital)

Sleep A-1 seen a nurse in passing and she said - A-3 may

Wed May 9, 2018 9:15 am May 8<sup>th</sup> Sleep A-2

Upon Being Relieved From transport to Vernon  
Co. MO. Jail (2040 E. Hunter St Nevada MO 64777)  
From Green Co via Green County transport officer  
into Vernon County Custody.

I was placed in H#16 Holding Cell and Did  
not see medical until May 13, 2018.

4 days I slept on a mattress that was soiled  
with Human feces under Blankets that were  
soiled From prior occupants. It stank, was  
unsanitary, <sup>inhumane</sup> for 4 days I plead to every co. and  
police officer that would listen to me every  
30 mins, I was denied Medical attention  
For 4 days, left in very Nasty unsanitary  
conditions with a constant Flow of Intake  
of inmates (Continued next page)

CO. KENNY WEEKEND NIGHT COMMANDER

May 13 2018 1 pm

May 17 2018 Finally got to see a Nurse at this point  
took pictures of my finger saying I would probably lose my finger  
~~that is why they took multiple pictures~~  
at this Jail, By the second day of  
Not Having My Meds a Fever Set in  
Cold Sweats, EXSTreme pain and Halucinat  
My Finger Swelled to twice the size  
it was the previous day for 4 days constantly  
worse Each day <sup>constant small abscess infection</sup> No matter how much I plead  
and even cried from the pain Humiliated  
and laughed at By Custody, Kept in a  
Cell with No means to contact someone  
Never Seeing Medical and torched By this  
Facility, No towels, No Soap, No toothbrush  
constant Sweats From the persistant pain  
and throbbing Brought on By Four days of  
Negligence Denied IRR's and Grievances  
everyday for those 4 days before the  
weekend Night shift Commander C.O. Kenny  
moved myself and Mr. Depaul to the gym with  
26 other Inmates On Mother's day (May 13, 2018)  
2 of the Inmates close had large Sores and Sists From  
Staph INfection of oozing green INfection.  
Put In medical Requests Daily (E-Filed) May 15<sup>th</sup>  
My P I N # Finally started working so I could File  
medical requests and IRR and grievances daily.  
First Seen Nurse on May 17, 2018 given Bactrim  
and She took pictures. Did Not see the Nurse or  
any Medical Care Physician until they transported me  
on May 24<sup>th</sup> 2018 to Lencere CO Jail



# Appendages

## Appendage / A-1

Medical Observations and Professional Care  
Physician of ER in North Cox Medical Facility  
Said:

X Rayed It, 2 Shots of antibiotics one  
in Each Hip, was prescribed pain meds  
and Antibiotics (See Medical charts and discharge  
papers with specific Instructions)  
S.I. transport officer was Instructions  
in writing and Verbally told By Care  
Physicians to See a finger/hand  
Specialist that there were chips and/or  
Multiple Breaks that could Be seen in X-Rays

A-2 From May 2<sup>nd</sup> - 8<sup>th</sup> 2018 while in Greene Co  
Jail with proper Medical Care daily and Sanitary  
environment. The Nurse would Redress  
and Pack my Finger (Left Hand Index Finger)  
2 X a day and Received meds.

A-3 May 9<sup>th</sup> 2018 Received to Vernon  
County Jail. 11:12pm after seeing Judge for  
Video Court that I and Inmate Depaul  
where first to see Judge (documented in  
Video court) when officers physically took  
down to the ground a Inmate that was  
Naked, At this point myself and Depaul  
were the only 2 done with video court  
in the same area as this Incident occurred

Continued From Front Pg A-3

May 2018

We Depaul and I where placed in the Bull pen and seen the Nurse and/or Medical Specialist Pass By and stopped her to show her my finger that it had to be packed 2 X's a day, This Nurse or medical woman said: She said she did not have time for it and would be back; she never did return and I didnt see her again the rest of the time was ~~in~~ in Vernon County Jail

Signed X Joseph Harrison

Signed this Fourth day of June, 2018

are facts and true to the best of my ability and recollection

Helped with paper work and writing By Bill Filbeck JR

Signed Billy Filbeck Jr.  
June 4th 2018

- X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.  
to award me pain, suffering, punitive  
Damages along with further medical expenses  
and pain suffering for past, present and future also  
Lawyers Fees and Filing. So The County will Never  
XI. Counsel: do this to anyone again.

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. Bill Filbeck JR, #1018945 P.O. 256, Lampe Mo. 65681

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes ☐ No ☒

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted.

C. Have you previously had a lawyer representing you in a civil action in this court? Yes ☐ No ☒

If your answer is "Yes," state the name and address of the lawyer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this Fourth day of June 2018

Joseph Harrison  
Signature(s) of Plaintiff(s)



Joseph Garrison  
380 E Water St  
Mt. Vernon MO

65712

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